

**Remarks/Arguments**

The amendments set forth herein are provided solely to clarify the invention as filed and set forth in the pending claims in order to comply with applicable statutes and regulations. The amendments are not intended to limit the invention or preclude the application of equivalents which Applicant may be entitled to under law.

**Status of the Application**

The disclosure was objected to for lack of precision on page 11 line 11. Claims 8 and 9 were objected to due to referring to claim 6 rather than claim 7. Claims 1-9 were rejected under 35 USC 102(e) as being anticipated by Thomas (US patent 6,781,623).

**Response to section 3:**

**Claim objections:**

The numbering of claims 8 and 9 have been corrected.

**Claim rejections, 35 USC §102**

**Claim rejections -- 35 USC §102(b)**

The rejection of claims 1-9 under 35 USC 102(b) as being anticipated by Thomas (US 6,781,623) are respectfully traversed in part and overcome in part.

**Response to the claim 1 and 2 rejections:**

The rejections of claims 1 and 2 are respectfully traversed in part and overcome in part. To traverse, applicant respectfully submits that the system and device of Thomas only corrects for differences in image sensor orientation. Thomas does not teach putting orientation sensors on both the image sensor and the display device.

As an example, note that although Thomas figure 6, shows Thomas' angle sensor (20) operating on CCD [image sensor] data (16), there are no figures (or teaching) in Thomas comparable to the art taught in present specification figures 12-15, which show an angular sensor [orientation sensor] physically connected to the display. Thomas fails to teach means to correct images when both the image sensor and the display are at arbitrary and variable angles relative to each other and the viewer.

To make this distinction clearer, applicant has overcome the rejection by amending claims 1 and 2 to more specifically teach that the digital imaging system consists of both an image sensor and a display, both of which have their own respective orientation sensors, and wherein at least one image manipulator takes information from both the image sensor orientation and the display orientation to adjust the image.

Support for this amendment may be found in Figures 5-7, which shows an angular sensor (131) attached to the image sensor (141), and an image manipulator (145) or (143) with output (image signal) going to a display (147); and Figures 12 to 14, which the input (image signal) going to a display (147) with an attached angular sensor (131) and an image manipulator (145) or (143). Support may also be found in specification paragraphs [0024], [0044], and [0051].

#### **Response to the rejection of claims 3-4 and 6.**

The rejection of claims 3, 4, and 6 are respectfully traversed in part and overcome in part. Claims 3, 4 and 6 are dependent claims to claim 1, which as previously discussed has been amended to more clearly teach art that was not contemplated by Thomas.

#### **Response to the rejection of claim 5.**

The rejection of claim 5 is respectfully traversed in part and overcome in part. Claim 5 is a dependent claim to claim 1, which as previously discussed has been amended to more clearly teach art that was not contemplated by Thomas. Additionally, claim 5 has been

amended to make it parallel to the teaching of claim 1, that there can be more than one orientation sensor.

**Response to the rejection of claim 7:**

The rejection of claim 7 is respectfully traversed in part and overcome in part. To traverse, applicant respectfully submits that nowhere does Thomas teach a camera with an image sensor, image sensor orientation sensor, image manipulator, and means to input the display device orientation into the camera. To overcome this rejection, applicant has amended claim 7 to more clearly teach this distinction.

Support for this amendment comes from previously discussed Figures 5-7, Figures 12-14, and specification paragraphs [0024], [0044], and [0051]. Additional support for various means to enter display orientation into the camera can be found in specification paragraphs [0024] *"selection of a "portrait" or "landscape orientation), and using various internal and user supplied inputs"* [0032] *"the orientation sensor can also be a virtual orientation sensor, such as would be used in a virtual "enlarging easel" or "virtual negative carrier" to align a "horizon" with the output picture borders or edges."* And [0051]: *"combined image sensor and display devices may be configured, which devices may sense, display, store, send or receive images as necessary to ensure appropriately reoriented images are presented to the viewer "*.

**Response to the rejection of claims 8 and 9:**

The rejections of claims 8 and 9 are respectfully traversed in part and overcome in part. Claims 8 and 9 are dependent claims to claim 7, which as previously discussed has been amended to more clearly teach art that was not contemplated by Thomas. Additionally, claim 9 has been amended to clearly distinguish which orientation sensor is being limited.

**New claims:**

Support for new claim 10 can be found in specification paragraphs [0024], [0032], and [0051].

Support for new claims 11 and 12 can be found in specification paragraphs [0030] and [0033].

Support for new claims 13 and 14 can be found in specification paragraphs [0006], [0026], [0029] and [0030].

Support for new claim 15 can be found in specification paragraph [0038]

Support for new claim 16 can be found in specification paragraph [0038].

Support for new claim 17 can be found in specification paragraphs [0044]-[0049].

Support for new claim 18 can be found in specification paragraphs [0024], [0032], and [0051].

Support for new claim 19 can be found in specification paragraph [0044].

Support for new claim 20 can be found in specification paragraph [0046].

Support for new claim 21 can be found in specification paragraph [0030].

Support for new claim 22 can be found in specification paragraph [0026].

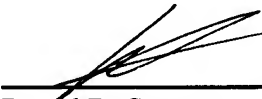
Support for new claim 23 can be found in specification paragraphs [0006], [0026], [0029] and [0030].

Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application; the undersigned can be reached at the telephone number set out below.

The Commissioner is authorized to charge any additional fees to process this Amendment, or credit any over-payments that may apply, to our Deposit Account No. 50-2421.

Respectfully submitted,

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